



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

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May 20, 2009

George Drew
Environmental Compliance Specialist
Covanta Haverhill, Inc.
100 Recovery Way
Haverhill, MA 01834

Dear Mr. Drew:

Thank you for the 2008 Material Separation Plan 4 ("MSP4") Annual Report. The Massachusetts Department of Environmental Protection ("MassDEP") has reviewed the Covanta Haverhill ("Covanta") facility report and found that the report included all relevant elements and provided good summaries of your MSP4 programs.

Covanta's report will be posted on MassDEP's website in the next month along with a summary comparison of MSP results across facilities. We look forward to working with you on the continued implementation of MSP4.

As discussed in our MSP strategy meeting on May 1, 2009, a MSP5 draft for CY10 is due by August 1, 2009. And unlike previous MSPs, MSP5 will be a three year plan.

Sincerely,

Greg Cooper, Deputy Division Director
Consumer Programs
Bureau of Waste Prevention

cc: Daniel Harty, MSP Coordinator



Annual MSP Progress Report

Covanta Haverhill, Inc.
RR0128.008

Reporting Year 2008

In accordance with 310 CMR 7.08(2)(i) and the Material Separation Plan Guidance for Municipal Waste Combustors, please find attached the annual progress report for reporting year 2008. This report documents the efforts and progress to date on educating the public to the hazards associated with mercury and programs designed to facilitate removal of mercury from the waste stream.

Format for Mercury MSP Annual Reports

The Integrated Waste Services Association and its members, Covanta Energy and Wheelabrator Technologies, together with MA DEP, have agreed on the following reporting format for Annual Reports of their respective Material Separation Plans submitted to the MA DEP. For the 2008 Reporting Year (January – December, 2008), facilities will submit Annual Reports containing information as described below.

I. Summary of Plan Activities

This summary may mirror the MSP Plan description, and would include notations of changes or alterations to that Plan description for the activity that do not rise to the level of an amendment to the plan. The description includes the following information where applicable:

- a. Summary/Goal of program/activity/task;
- b. Problems/issues experienced while trying to implement program/task;
- c. Changes to program between proposal and implementation, if appropriate;
- d. Manner of contacting appropriate audience, advertising, or providing notice of the program;
- e. Duration of program;
- f. Proposed number of individuals or organizations to be contacted, if appropriate for that task (from Plan description);
- g. Actual or estimated number of individuals or organizations contacted, if appropriate;

II. Spreadsheet Summary of Mercury-Containing Products Collected for each Community

The listing will be sorted as follows:

- Listing by community or targeted audience, e.g., town, school, etc.;
- Type of product collected;
- Quantity of each product collected, and weight of mercury collected by product type.

III. Spreadsheet Summary of Mercury-Containing Products Collected for each Program/Activity

The listing will be sorted as follows:

- Listing by program/activity/task, i.e., school cleanouts, thermometer exchanges household hazardous waste collection days;
- Total amount of products and total weight of mercury collected.

IV. Spreadsheet Summary of MSP Budget and Expenses

The Report shall provide, at a minimum, a summary of the budget for programs and actual program costs sorted as follows:

- Administration Costs;
- Education Costs of IWSA, listed by program;
- Individual Program/Activity/Task Costs;
- Other Costs broken out as appropriate.

I. Summary of Plan Activities

During 2008, Covanta Haverhill, Inc. (Covanta) continued the implementation of the fourth Material Separation Plan (MSPIV) for mercury containing products. The MSP IV, with some variations, is a continuation of the goals and programs of the previous MSP's. A major addition is the inclusion of an activity for Health Care Facility Mercury Cleanout. MSP IV calls for various Hg collection and outreach activities to be continued to be conducted in the Covanta contract communities. In addition, other activities continue to be conducted with the hope of impacting and educating a broader population base. The following is an outline of the activities that were conducted between January 1, 2008 and December 31, 2008. Also included, where possible, is a quantification of the success of the activity. Where results of activities that were conducted are of a more subjective nature, we will attempt to indicate a level of success/participation.

1. Mercury Products Collection Routes

a) Goal of program

The primary objective of this program is to create and coordinate a collection route system between mercury recyclers (Veolia ES Technical Solutions, LLC or Complete Recycling Solutions) and the larger, non-residential, generators of mercury content bulbs (fluorescent, HID, Metal-Halide etc.).

b) Success\Problems encountered

In 2008, there continued to be an increase in the number of generators to accept the offer of a pickup at the generators location as opposed to having them transport to the transfer station or Mercury Collection Event. Pickups by the recycling company were accomplished at twelve (12) schools, two (2) hospitals, four (4) municipal electric companies, 1 court house, and 1 hardware store. The addition of retail stores that agreed to participate in Covanta bulb collection program is discussed in 4c. below. Pickups at generator's locations could be offered with no increase in costs to Covanta as there are no transportation charges for non business locations using Mass State Contract FAC26 (Category A, Collection and recycling/Disposal of Fluorescent Lamps, Mercury Devices and Ballasts).

All businesses with greater than 36 bulbs were offered assistance in contacting Complete Recycling Solutions for their mail in program, CRS-PAK or having a pickup at their location. Covanta offered to provide a 50% reimbursement for the 1st year of these programs.

Although this assistance was offered in all advertisements, at all outreach activities, and in notices hand delivered, no businesses accepted this option in 2008.

c) Changes made

This option was continued to be offered when quantities warranted. It was stressed that this option minimized labor and breakage.

d) Outreach conducted

A mailing to a total of 949 businesses/organizations was made apprising them of upcoming collection events and offered this option.

e) Duration of program

This approach was used throughout 2008 in the contract communities.

f) Proposed number of participants

Efforts were made to maximize the number of participants as time permitted.

g) Number of individuals\ organizations contacted

See d) above

2. Mercury Product Collection Events

a) Goal of program

The goal of this program is to hold collection events to target and facilitate the collection of mercury and mercury bearing products from small businesses, municipal departments, and residents of the Covanta contract municipalities. While larger businesses were allowed to participate with a maximum of 36 bulbs accepted for recycling, a separate program that was discussed earlier in this report was available and designed to more appropriately meet and satisfy their needs for the collection of mercury bearing wastes..

In 2008, Five (5) communities continued to agree to open their transfer station Mercury Collection Sheds to businesses. This was advertised in local newspapers. No Mercury Collection Events were scheduled in

these communities. Notices to businesses were distributed. Seven (7) communities continued to restrict the Mercury Collection Sheds to residents and municipal /school depts. only. Two (2) communities continued to reject Covanta's offer to provide a Mercury Storage Shed or steel roll off box storage container. These necessitated the continuance of special one day (2 hour) events.

The five (5) communities open to businesses at the transfer station:

- Groton, MA
- Harvard, MA
- Littleton, MA
- Melrose, MA
- Stoneham, MA

The seven (7) communities not open to businesses at transfer stations:

- Ayer, MA
- Danvers, MA
- Essex, MA
- Lawrence, MA
- Lynnfield, MA
- Middleton, MA
- Reading, MA

The two (2) communities not allowing sheds at recycling centers:

- Haverhill, MA
- Wakefield, MA

b) Success\Problems encountered

In general, Covanta observed an increase in the number of mercury products collected through this program.

During 2008, all 14 of the Covanta contracted communities had extensive education/outreach conducted in their respective business communities. Collection events were conducted in a similar manner. A Mercury Collection Event is an advertised opportunity for businesses/residents to turn in spent mercury products on a scheduled day during the hours of 10 am-12 noon. The Covanta MSP Coordinator would manage the events. At transfer stations with mercury sheds, no mercury recycling truck was needed. Mercury products were placed in the shed for later pickup. However, in Haverhill and Wakefield, a mercury recycler truck and trained personnel were needed. A total of twenty one (21) collection events were held for these communities.

In April, June, August, and October, events were held in: Haverhill, Lawrence, Wakefield

In June and October, events were held in: Middleton with adjoining communities of Lynnfield and Danvers invited to participate.

In April and August, events were held in: Danvers with adjoining communities of Lynnfield and Middleton invited to participate

In April and August, events were held in: Ayer and Reading

In July, an event was held in: Essex

Problems continue to be the ability to attract new participants to these seasonal events. Covanta continues to make requests to municipal supervisors that businesses be accepted at transfer stations and that Haverhill and Wakefield accept storage containers.

c) Changes made

In 2008, a mailing list of businesses with contact names continued to be established in communities that did not allow businesses a recycling option. Business names were secured from chambers of commerce and phone books. Calling or visiting businesses resulted in establishing a contact that understood and agreed to the program. This list of businesses/contacts will be increased on an on-going basis. In the past, events were poorly attended although notices were hand delivered to many businesses and the events advertised in local papers.

However, with the start of mass mailings to businesses before “Events”, the volume of mercury items turned in immediately increased.

By the close of 2008, mailing lists for:

- Haverhill contained 312 entries
- Danvers 179 entries
- Essex 93 entries
- Lawrence 83 entries
- Reading 122 entries
- Wakefield 111 entries.

In 2008, special attention was paid to tanning salons. Tanning bulbs, as well as compact fluorescent bulbs, were given a separate accounting on spreadsheets. In the past, these bulbs were included with u-tubes. The amount of tanning bulbs collected in 2008 was 739.

Also a special emphasis was placed on compact fluorescent bulbs. Advertising always contained pictures of cfl's. As mentioned above, a separate tally was kept regarding these bulbs that have gained in popularity over the recent past. A total of 3,532 were collected in 2008.

d) Outreach Conducted

Extensive outreach was conducted before each event, including placing 46 newspaper advertisements in 2008, use of local options, i.e. town websites, senior citizen newsletters, mailings to businesses/organizations. The events were also listed on the mercury website- www.keepmercuryfromrising.org. Phone calls from a “reminder list” as well as mass mailings described above were used to increase participation.

e) Duration of program

This approach was used throughout 2008 in target communities

f) Proposed number of participants

N/A

g) Number of individuals\ organizations contacted

Devoting a full day to visiting businesses in each community before each of the events resulted in outreach to many of the possible participants to this program as well. This also encouraged those businesses that had not collected bulbs in the past to set up a recycling program.

As mentioned in 1d above, 949 mailings as well as ads in local papers, phone calls and personal visits were made to advertise the events.

In communities where transfer stations now accept bulbs from businesses advertisements were placed in local newspapers.

3. **Thermometer Exchanges**

a) Goal of program

The goal of this activity is to help educate people on the dangers of mercury type thermometers, help residents safely recycle these devices, and provide them with safe non mercury replacements.

b) Success\Problems encountered

Since Chapter 39 of the Act of 2002 banned the sale of mercury fever thermometers in Massachusetts, fewer and fewer fever thermometers are being exchanged. The volume decreased from 411 in 2007 to 253 in 2008.

c) Changes made

Thermometer exchanges were included in all outreach activities At the 4 flu clinics that were attended, turning in fever thermometers was stressed.

d) Outreach conducted

Permanent exchange locations maintained in each of the 14 contracted communities with advertising conducted in various ways including town websites, senior center newsletters, etc.

e) Duration of program

In 2008, Covanta offered this program throughout the year.

f) Proposed number of participants

Efforts were made to maximize the number of participants as time permitted

g) Number of individuals\ organizations contacted

This program was discussed at all outreach opportunities

4. **Municipal Reimbursement for Mercury Program Expenses**

a) Goal of program

To assist communities with the cost associated with mercury product recycling, Covanta continued to reimburse all Covanta contract communities for the cost incurred in collecting, storing, and recycling of residentially and/or municipally generated mercury containing products (fluorescent bulbs, thermostats, thermometers, etc) collected at HHW days or at permanent facilities (Universal Waste Sheds)

b) Success\Problems encountered

In 2008, it was evident that this program is firmly established in contracted communities. Mercury storage sheds are used with increasing regularity. Of the contracted communities, two are still without storage sheds. Haverhill and Wakefield will not accept Covanta-donated buildings at this time. However, the Mercury Collection Events in these cities have seen increased participation.

c) Changes made

During 2008, with the disposal prohibition becoming effective (5/1/08) and the supplying to communities of the MA DEP "It's the Law" signs, the general public was notified that recycling of mercury products to include bulbs was mandatory. See Attachment #1

Also in 2008, Covanta enlisted the aid of hardware stores to collect bulbs at no cost to customers. The stores had the option of either taking the bulbs to the Covanta collection sheds at their DPW/Transfer Station or requesting pickup by the recycling company.

A total of 8 electric supply/hardware stores joined this program. Participating Stores for 2008 included:

1. Aubuchon Hardware Ayer, MA
2. Standard Electric Ayer, MA
3. Moison Hardware Groton, MA
4. Aubuchon Hardware Haverhill, MA
5. True Value Hardware Haverhill, MA
6. Aubuchon Hardware Littleton, MA
7. Round's Hardware Stoneham, MA
8. Hart's Hardware Wakefield, MA

In addition to this, Home Depot/Reading, MA collects cfl's under their corporate program.

Each was advertised in the local paper as offering free recycling of fluorescent bulbs. In addition, each store was given labeled boxes to be offered to customers. These boxes were to contain 1 or 2 cfl's and instructions on the cover gave location (s) in the community where boxes could be returned for free recycling. For example, Round's Hardware/Stoneham were supplied boxes that could be returned to Round's Hardware or the Stoneham Recycling Center. (see Attachments #2 & #3)

In 2008, employees of Covanta/Haverhill were notified that a Universal Waste 5 gallon pail was available in the MSP Coordinator's office for mercury products from home.

Larger items, i.e. 4' and 8' bulb s could be taken to the Universal Waste Storage area.

d) Outreach conducted

It has been found beneficial to communicate with municipal contacts frequently to demonstrate the importance of the program and maintain their cooperation. This is done with personal visits, mailings, e-mails, and phone calls.

e) Duration of program

This program continued throughout the year.

f) Proposed number of participants

N/A

g) Number of individuals\ organizations contacted

Besides the DPW, transfer station personnel, and the 14 recycling coordinators, there are people with various functions within their community that take an interest and take part in assisting the program. Volunteers are included in this list.

5. Thermostat Collection Program

a) Goal of program

A significant portion of mercury contained in the municipal waste stream is entering through the improper management/disposal of mercury containing thermostats. The goal of this activity is to promote thermostat recycling by educating, providing recycling incentives and assisting area tradesmen.

b) Success\Problems encountered

Tradesmen turned in 1,039 mercury thermostats and received the \$5/each incentive.

Other collection activities added another 299 thermostats to this total.

It continues to be difficult to contact these small business men as they generally work out of their homes and are reluctant to identify themselves with a particular municipality.

c) Changes made

The Massachusetts Mercury Management Act of 2006 called for a phase out of mercury thermostats by May 1, 2008. This information was distributed in all correspondence to tradesmen.

d) Outreach conducted

In 2008, efforts continued to identify tradesmen in contract communities willing to collect spent mercury thermostats. A \$5/each incentive was offered as in past years. Many phone calls and mailings were made to increase the number of tradesmen in the program. This opportunity was particularly stressed at presentations before community groups.

e) Duration of program

This program was continued throughout 2008

f) Proposed number of participants

During 2008, the number of participating supply stores/tradesmen increased from 77 to 92

g) Number of individuals\ organizations contacted

Efforts to contact and add to participating list is done regularly.

6. School Mercury Cleanouts

a) Goal of program

Goal of this activity was to work with Covanta communities' schools to educate staff, identify mercury products, assist in safe removal of their mercury containing devices and supply non mercury replacements. To accomplish this, Covanta continued to use the services of Todd Dresser, C.H.M.M. of Cuoco & Cormier to: initially contact school representatives, secure a participation agreement, conduct a mercury inventory, coordinate replacement of mercury products with non mercury items, arrange safe pickup of mercury products and follow up.

b) Success\Problems encountered

The result of the school mercury cleanout in 2008 (9 schools) was 124 thermometers, 16 thermostats, 1907 grams elemental mercury, 3 blood pressure units, 1 Spectrum Tube, 1 Sling Psychrometer, 2 barometers. The program was stalled temporarily as Todd Dresser was unavailable due to health problems from June 9 to September 1.

c) Changes made

For MSP IV, private schools have been added to this program.

d) Outreach conducted

Todd Dresser sent letters explaining the program to everyone identified by recycling coordinators as possibly having an interest in using this opportunity. This included school administrators, boards of health, etc. Follow up phone calls were also made by Mr Dresser. Also a description of this program was included in every outreach presentation given by Covanta's MSP Coordinator.

e) Duration of program

As explained in 7b above, Todd Dresser was on medical leave from June 9 to September 1.

f) Proposed number of participants

MSP IV targeted 10 schools to be serviced during its 2 year period. In 2008, the following schools were serviced:

- 1) Haverhill High School
- 2) Hunking School Haverhill, MA
- 3) Consentino School Haverhill, MA
- 4) Nettle School Haverhill, MA
- 5) Austin Prep Reading, MA
- 6) Northeast Metro Tech HS Wakefield, MA
- 7) Wakefield High School
- 8) Galvin Middle School Wakefield
- 9) Groton School

g) Number of individuals\ organizations contacted

Todd Dresser sent many outreach letters to target communities to solicit participation in this recovery program.

7. Health Care Facility Mercury Clean-out Program

a) Goal of Program

Goal of this activity is to offer to health facilities in Covanta communities an opportunity to educate staff, identify mercury products, assist in safe removal of mercury containing devices and supply non mercury replacements. As in the School Mercury Cleanouts, Covanta has contracted to have Todd Dresser, C.H.M.M. of Cuoco & Cormier to contact health facilities, secure a participation agreement, conduct a mercury inventory, coordinate replacement of mercury products with non mercury items, arrange safe pickup of mercury products and follow up.

b) Success/Problems encountered

The result of this program in 2008 was the removal of a mercury thermometer and a mercury switch from Nashoba Valey Medical Center, Ayer, MA.

As noted in 6 b. above, Todd Dresser's medical leave temporarily stalled this program.

c) Changes made

N/A

d) Outreach conducted

N/A

e) Duration of program

This program will continue though 2009

f) Proposed number of participants

Five (5) organizations were to be serviced in 2008.

g) Number of individuals\organizations contacted
N/A

8. Regional Outreach/Education: IWSA Component

See Attachment 1.

9. Facility Level Outreach/Education Efforts

Along with the programs and activities described earlier in this report, Covanta conducted and/or participated in other outreach and educational activities designed to instruct the public on the problems associated with improper management of mercury containing products.

To encourage cooperation with the mercury product recycling program as well as community efforts in recycling, Covanta purchased and offered for use recycling containers as well as disposable trash containers for use at community events.

(see Attachment #4) This included activities such as the Haverhill Christmas parade

New printed material from IWSA was distributed at outreach opportunities. This included a handout “Don’t Put Items Containing MERCURY In The Trash” as well as wall posters notifying of mercury collections. These pass outs as well as promotional items stimulated interest from the public. All outreach material contained the website
“KeepMercuryfromRising.org”

In the past, outreach information was limited to an explanation of the Material Separation Plan. A very important change in outreach activities was the addition of information on the July, 2006 Massachusetts Mercury Management Act. Copies of the Fact Sheet updated the public on steps being taken by the state to:

- 1) inform the public on the dangers of mercury in the environment
- 2) phase out mercury items
- 3) insure proper labeling
- 4) advise schools and health care facilities of mercury bans
- 5) stress that compact fluorescent bulbs need to be recycled

Outreach for 2008 * denotes offer of recycle containers & trash boxes

1/11&1/12/08 Host booth at MMA Expo
1/16/08 Attend 3rd Annual Mass Municipal Recyclers Workshop in Worcester
2/11/08 Presentation at Groton Veterans Breakfast (28 attendees)
2/26/08 Table at NSCC Business EXPO/Danvers
2/28/08 Presentation to Ayer Council on Aging Men’s Breakfast with 14 present
2/28/08 Presentation to Ayer/Harvard/Shirley Rotary Club with 33 present
3/3/08 Presentation to Middleton Kiwanis with 16 present
3/11/08 Attend Northeast Municipal Recycling Council meeting/Wilmington
*4/12/08 Table at Reading Earth Day
4/14/08 Presentation to League of Women Voters in Middleton
4/16/08 Table at Merrimack Valley Chamber’s Business Expo
4/17/08 Attend MassRecycle meeting in Westboro, MA
4/22/08 Attend Household Hazardous Waste meeting in Beverly, MA
4/26/08 Table at Danvers Earth Day Recycling Event
*4/27/08 Table at Middleton’s Earth Day Event
*5/1/08 Table at Melrose DPW Day
5/3/08 Assist at Devens HHW day
*5/10/08 Table at Harvard’s Apple Blossom Festival
5/13/08 Presentation to Wakefield Rotary with 27 present

5/14/08 Table at Route 2 Business Expo
 *5/28/08 Table at Haverhill Council on Aging's Health & Fitness Fair
 *6/7/08 Table at Festival by the Lake/Wakefield
 6/9 & 6/10/08 Booth at NRRA Expo/Nashua, NH
 6/19/08 Attend MRC meeting
 *6/21/08 Table at Reading Friends & Family Day
 *7/3/08 Table at Devens Celebration Day
 7/11/08 Presentation to Littleton Rotary
 *7/20/08 Table at Littleton Triathlon
 8/12/08 Attend MassToss Cooperative meeting in Harvard, MA
 9/4/08 Presentation on Haverhill Community Television
 *9/13 & 14/08 Table at Harvard Lions Club Fall Festival
 *9/20/08 Table at Grotonfest
 9/27/08 Assist at HHW/Lunenburg
 *9/28/08 Table at Home Depot/Reading
 10/2/08 Merrimack Valley Chamber of Commerce Expo
 10/4/08 Assist at HHW/Haverhill
 10/7/08 Attend EPP/Worcester
 *10/11/08 Table at Harvard's LWV Flea Market
 10/18/08 Assist at HHW/Melrose
 *10/25/08 Table at Essex Clamfest
 10/28/08 Table at Home Depot/Reading "Green Day"
 11/4/08 Presentation to Exchange Club/Lawrence
 11/8/08 Table at Melrose Energy Fair (in PM)
 11/19/08 Presentation to students at Consentino School/Haverhill

Flu Clinics- Discussed facets of MSP IV program with attendees:

| | Date | Location |
|-----------|----------|-----------------|
| Essex | 11/5/08 | Fire Station |
| Groton | 11/26/08 | Senior Center |
| Haverhill | 11/6/08 | City Hall |
| Littleton | 11/25/08 | Shattack Street |

For the past 2 years, Covanta increased participation in Household Hazardous Waste Days conducted by contracted communities. With the understanding that mercury products had to be included in advertisements and notices, and had to be collected at HHW's, Covanta offered:

- 1) to lend two (2) A-Frame signs with movable letters (See Attachment #5)
- 2) to purchase fifty (50) plastic corrugated signs printed with specific information for each HHW(See Attachment #6)
- 3) to sponsor local newspaper advertising
- 4) to pay the portion of HHW invoice for the recycling of mercury products
- 5) MSP Coordinator would act as volunteer to assist at HHW's

Covanta also donated \$2,450 to help cover the costs for two (2) Haverhill HHW's

Assistance and outreach at Household Hazardous Waste Days:

| | |
|--------------|---|
| May 3 | Assisted at Devens HHW (for Ayer/Groton) |
| September 27 | Assisted at Lunenburg HHW (for Ayer/Groton) |
| October 4 | Assisted at Haverhill HHW |
| October 18 | Assisted at Melrose HHW |
| November 8 | Assisted at Middleton HHW |

November 15 Assisted at Lynnfield HHW

Bus Advertisements

One of the larger efforts was to continue to purchase advertising space on two school buses in Haverhill. Approved by the MA DEP, Covanta has implemented this activity since 2004. Not only does this advertising present the mercury recycling message in a mobile way, but the majority of the monies goes to the city schools. With this program, these buses not only carry the children (and the message) throughout the city of Haverhill each morning and afternoon, but are then scheduled for supplemental activities during the day. For field trips and school sports events, these buses travel throughout the state as well to neighboring states. In addition, these buses were utilized during the summer season for other programs.

Summary

Overall, the results of the second year of MSP IV were quite good.

See below a comparison of amounts of mercury products for recycle. For 2008, the MA DEP asked that separate tallies be kept on u-tube, cfl, and tanning bulbs

| | 2006 | 2007 | 2008 |
|----------------------------|----------|---------|--|
| Fluorescent bulbs: | 186,080 | 176,844 | 228,147 |
| U-Tubes/Compacts/Tanning | 4,411 | 5,057 | 4,095 u-tubes 739 Tanning 3,532 Compacts |
| HID | 978 | 989 | 1228 |
| Blood Pressure Instruments | 14 | 66 | 77 |
| Thermostats | 968 | 1,220 | 1,338 |
| Thermometers | 876 | 411 | 428 |
| Elemental Mercury | 40,374 g | 9,217 g | 15,754g |

ATTACHMENT 1

IWSA OUTREACH ACTIVITIES

Material Separation Plan

For the Diversion of Mercury

Annual Report RY 2008

**Integrated Waste Services Association
(IWSA)**

January 2009

Integrated Waste Services Association

Materials Separation Plan Activities

Annual Report on the Results of the Mercury Recovery Program

1. Introduction

The Integrated Waste Services Association's activities in support of Massachusetts' Waste-to-Energy Facilities' Materials Separation Plan for 2008 continue the direction set in prior years. This report describes the activities involved in the design, implementation and operation of IWSA's Program in support of the five waste-to-energy plants operating in Massachusetts and their Mercury Recovery Programs (MRP). Each facility's MRP is community focused, locally based and operated; and the IWSA activities are designed to support in a coordinated fashion the MSPs on a regional basis.

IWSA Regional Program activities for 2008 consisted of the following elements:

- Radio Advertising for "Keep Mercury From Rising"
- Evaluation & Analysis of the "Keep Mercury From Rising" campaign
- Revision & Update of Website www.keepmercuryfromrising.org
- Development and distribution of new print materials to facilities, the public and media

2. Regional Education Program "Keep Mercury From Rising"

The Integrated Waste Services Association coordinated the regional education / outreach program for five Massachusetts' waste-to-energy facilities including facilities located in Saugus, North Andover, Millbury, Haverhill, and SEMASS.

a) Objectives

In 2008, the Regional Outreach Plan supported individual facility programs by the continued promotion of the media campaign, "Keep Mercury from Rising". This campaign included two waves of radio advertisements designed to reach the broadest possible audience. The campaign used targeted advertising educating the listeners about the concerns related to mercury. The advertisements also encouraged residents to contact their local health departments to receive more information about mercury and find out where in their communities they could dispose of mercury containing devices.

The objectives for 2008 were met and included the following:

- The Regional Outreach Program continued to raise awareness about mercury-containing products in the home and the proper handling and disposal of these products;
- The Program provided information and promote local recycling events;
- The Program continued to build an integrated communications program that leveraged opportunities for incremental, free media, and worked synergistically with the efforts of individual waste-to-energy facilities.

b) Tactics

A public survey was completed in May 2008 measuring the effectiveness of the educational campaign "Keep Mercury From Rising." Findings from this survey guide the development of the Regional Program. The website, www.keepmercuryfromrising.org, continues to be more user-friendly, and includes more contact information and contractor material, as well as continuing to provide information and assistance with recycling of mercury-containing products to the general public. IWSA produced five videos in 2003

for each waste-to-energy plant, and these videos are available on the website. The videos show the unique and effective programs now in place to keep mercury containing products out of the waste stream.

i) Survey

The effectiveness of the regional education campaign is in large part measured by an annual research survey. The polling is designed to measure positive changes in public attitudes and behaviors, as well as the receptiveness of the message. The survey questionnaire was in the field during May 2008, and consisted of 400 completes, providing a 95% confidence level.

The fragile Massachusetts economy of 2008 took its toll on the thinking and opinions of its residents in this study. We measured dramatic year-over-year increases on issues like unemployment and the state budget, as well as increased expectation/responsibility assigned to government and government agencies when it came to environmental issues.

Respondents continue to say they are willing to pay much more for equivalent non-mercury containing items, despite the failing economy. Despite the faltering economy, mercury awareness continued to climb in key categories – it just was not matched with the associated urgent actions measured in previous years because it appears that consumers have economic challenges on the front burner today.

Fluorescent light bulb awareness has doubled since 2001 (58% vs. 29%) and was up 11 points since last year. For the first time ever, over 60% of all households said they used *several bins* for different types of products (plastic vs. newspaper). Circular wall thermostat awareness continued its climb to 68% awareness vs. 58% in the year 2005. Glass thermometer mercury awareness rebounded to 92% - a five-year high. Fish advisory awareness (86%) also rebounded and was just one point short of its all time high. Owners of mercury products were given the highest responsibility for safe disposal (4.3 mean), while waste companies (3.5 mean) were assigned the lowest responsibility rating recorded in eight years.

The polling also reflected hard realities in the public's balancing of economic and environmental priorities. Recycling participation (80%) has now fallen for the second year in a row and is down 6 points from its high of 86% in 2006. Urgency to replace a mercury item was replaced by convenience as fewer respondents (48% today vs. 61% in 2006) would immediately stop using a mercury item in the home, if labeled, and would *wait* to replace it, as needed.

ii) Advertising

In 2008, IWSA continued to air the radio spot that was developed in 2007. The new spot capitalizes on the educational outreach in past years and offers listeners a proactive message on what to do with items that contain mercury. Set to a catchy jingle, the advertisement reminds people which products are most likely to contain mercury and "Don't Put Mercury in the Trash!". The advertisement directs listeners to the Keep Mercury From Rising website or their local health departments for more information. The radio spot is available for download on KeepMercuryFromRising.org.

IWSA purchased two separate two-week radio buys in 2008 and advertised on radio stations that broadened our geographic outreach. Radio is a targeted medium that provides cost-efficient mass communication and built frequency of message delivery.

The first two-week radio buy was implemented April 21 through May 2, 2008. Markets targeted by the radio buy were Boston, Worcester, New Bedford, and Cape Cod. In order to maximize the dissemination of the message, IWSA purchased another two-week radio buy that aired September 22 through October 3, 2008. Based on the results of the survey conducted after the radio ad, we believe the plan was successful in increasing public awareness.

iii) Web-based Tool

The www.keepmercuryfromrising.org website was completely redesigned in 2008. The new design is attractive and user-friendly. It provides new and improved information in a manner that will entice the user to explore the site and benefit more from its contents.

The site continues to provide information in the following categories:

Home – includes background on Keep Mercury From Rising and information on calling 1-866-9MERCURY for more information about safe disposal options.

Drop-off sites – provides information on where to drop-off mercury containing items.

Spills – provides a variety of information on actions one should take in the event of a mercury spill.

FAQs/Surveys –provides answers to common questions, as well as information derived from our surveys.

Video – provides the five videos developed by the facilities.

Links – links were proactively sought and added to this page and efforts were made to increase the number of other website that link to <http://www.keepmercuryfromrising.org>.

Media – provides the audio files for past and present radio advertisements as well as pdf files for our new and popular print materials.

iv) Print Materials

IWSA continues to disseminate the popular print materials developed in 2007 to reinvigorate the regional campaign. The materials include posters identifying items containing mercury and where you can bring those items in for exchange. IWSA also developed an eye-catching handout in the shape of a trash can that opens and discusses the types of mercury containing items that should not be put in the trash. These trash can flyers were extremely popular and demand was high. Tens of thousands of these flyers were printed in 2008 and continue to be very popular in every place that they are used.

Video

The five-minute “Keep Mercury from Rising” educational video was completed for each facility in 2003. The video explains the need to recycle mercury-containing products and the efforts undertaken by the state of Massachusetts and waste-to energy facilities to reduce the amount of mercury entering the environment.

The video now is being used at the five waste-to-energy facilities for educational purposes during tours and other meetings. Copies of the video have been made available to local cable access television stations and a “B-roll” of visuals and sound is available for media covering MSP events. Copies of the video also have been given to local public officials to be shown at meetings, schools,

senior citizen centers, and other organizations that would benefit from viewing the video. As noted above, the video also may be viewed at the website.

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| c) | 2008 Expenditures: | \$142,982 |
| | Activity | Actual Expenditure |
| | Survey | \$18,000 |
| | Media Buys | \$92,410 |
| | Website | \$13,925 |
| | Print Materials | \$18,647 |

ATTACHMENT 2

MSP Spreadsheets II, III and IV

ATTACHMENT 3

EXAMPLE OUTREACH MATERIALS